

1 JOHN C. BEIRS, COUNTY COUNSEL (SBN 144282)
2 By: David A. Silberman, Deputy (SBN 211708)
3 Hall of Justice and Records
4 400 County Center, 6th Floor
5 Redwood City, CA 94063
6 Telephone: (650) 363-4749
7 Facsimile: (650) 363-4034
8 E-mail: dsilberman@co.sanmateo.ca.us

ÈÖËŠÖÖÄÄ Æ Æ Æ

9 Attorneys for Defendants
10 COUNTY OF SAN MATEO, et al.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13

14 CHRISTIAN R. WILLIAMS

Case No. CV-03-5158 RMW

15 Plaintiff,

16 **STIPULATION AND ~~PROPOSED~~ ORDER**
17 **RE CASE MANAGEMENT CONFERENCE**

18 vs.

19 COUNTY OF SAN MATEO, et al.

20 Defendants.

21 **RECITALS**

22 1. WHEREAS, this case was initially filed in 2003;

23 2. WHEREAS, the County filed a motion for summary judgment in March 2008, which was
24 granted in September 2008;

25 3. WHEREAS, the Ninth Circuit reversed in July 2012 and Ordered that Plaintiff be
26 appointed counsel;

27 4. WHEREAS, in September 2012 the District Court reopened the case, but stayed it
28 pending appointment of counsel (and an additional four weeks following appointment);

5. WHEREAS, in January 2013 the District Court appointed counsel;

6. WHEREAS, since that time the undersigned have been diligently exploring whether the
case can be resolved without further litigation;

7. WHEREAS, those conversations remain ongoing, no significant discovery has occurred,
but a Case Management Conference is scheduled for April 26, 2013, a date which triggers meet and

1 confer and filing requirements that the parties would prefer to delay until they exhaust current resolution
2 efforts;

3 8. WHEREAS, April 26, 2013 is the first scheduled Case Management Conferences and the
4 parties have not previously requested a continuance of a Case Management Conference;

5 9. WHEREAS, because Plaintiff remains in civil custody, communication with him is more
6 challenging than normal and can therefore require additional time;

7 **STIPULATION**

8 The parties hereby stipulate that, with the Court's agreement, the Case Management Conference
9 currently scheduled for April 26, 2013, be continued for approximately three months to facilitate
10 exhaustion of settlement discussions.

11 Dated: April 5, 2013

DLA Piper LLP (US)

12
13 By: 

Maria Dryden

Attorney for Plaintiff

CHRISTIAN WILLIAMS

14
15 John C. Beiers

16 Dated: April 5, 2013

MICHAEL P. MURPHY, COUNTY COUNSEL

17
18 By: 

David A. Silberman, Deputy


Attorneys for Defendants

19 COUNTY OF SAN MATEO, et al.

20
21 **~~PROPOSED~~ ORDER**

22 **GOOD CAUSE APPEARING**, the Case Management Conference currently scheduled for April
23 26, 2013 is hereby continued to July 19, 2013, at 10:30 a.m.

24 **IT IS SO ORDERED.**

25 Dated: , 2013

26 
RONALD M. WHYTE, JUDGE
UNITED STATES DISTRICT COURT